

Message

From: Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]
Sent: 4/12/2017 6:55:01 PM
To: Donovan, Betsy [Donovan.Betsy@epa.gov]
Subject: RE: Rolling Knolls....

Okay, I was thinking the same thing...we probably don't need a revised DSRA.

-----Original Message-----

From: Donovan, Betsy
Sent: Wednesday, April 12, 2017 2:29 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: RE: Rolling Knolls....

Just a reminder, our DSRA comments drive the FS schedule. I'm not sure how to tackle all the comments at this point (compile them myself or enlist CDM like we did for the RI) and I haven't had a chance to look at yours. Do we need a revised DSRA?, if so that will totally push the schedule. Or... can our comments get incorporated into the FS.

I'm leaving for the day soon and will touch base with you tomorrow.

-----Original Message-----

From: Vaughn, Stephanie
Sent: Wednesday, April 12, 2017 1:51 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Subject: RE: Rolling Knolls....

Thanks. I just finished my review.

I still haven't looked at anyone else's comments, but I think the document is not even close to acceptable and I don't even know how to make specific comments since it is simply missing so much information.

It seems to me the group is not internalizing what we have been telling them, over and over again.

Attached is a pdf with my notes, but the whole thing really needs to be overhauled. There are a lot more comments I could have made, but I think we should meet to discuss.

I will reply to all the reviewers too, probably later today.

Ugh.

-----Original Message-----

From: Donovan, Betsy
Sent: Wednesday, April 12, 2017 1:46 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: FW: Rolling Knolls....

I asked for Juan's input...

-----Original Message-----

From: Fajardo, Juan
Sent: Wednesday, April 12, 2017 1:44 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Subject: RE: Rolling Knolls....

I don't see a legal issue with telling them that residential cleanup standards must be part of the FS.

-----Original Message-----

From: Donovan, Betsy
Sent: Wednesday, April 12, 2017 1:39 PM
To: Fajardo, Juan <Fajardo.Juan@epa.gov>
Subject: FW: Rolling Knolls....

Hi Juan, I just want to be sure that we can provide comments on the DSRA that the FS must include a residential soil cleanup alternative, because without an IC or restrictions we would have to resort to a residential scenario. It would probably screen out during the FS evaluation. Although, we agree that future residential use for the entire site is not reasonable, residential is not completely ruled out at this point. We would probably want them to evaluate a mixed use alternative too.

-----Original Message-----

From: Vaughn, Stephanie
Sent: Wednesday, April 12, 2017 1:27 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Subject: RE: Rolling Knolls....

Okay, good -- I agree. Just didn't want to spend time making comments along those lines if that was off the table.

Thanks

-----Original Message-----

From: Donovan, Betsy
Sent: Wednesday, April 12, 2017 1:25 PM
To: Vaughn, Stephanie <Vaughn.Stephania@epa.gov>
Subject: RE: Rolling Knolls....

We can have them look at residential, mixed use and recreational in the FS. They basically took residential out of consideration in the DSRA, but I don't see why we wouldn't include it, since without an IC in place the fallback or contingency remedy would have to be residential.

-----Original Message-----

From: Vaughn, Stephanie
Sent: Wednesday, April 12, 2017 1:03 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Subject: RE: Rolling Knolls....

Okay, yay, more to catch up on :)

Regardless, for the DSRA, should they still evaluate the future use scenarios described below, or are we comfortable with leaving off any residential?

I suppose I could look at the other comments you've received, but I'm trying to take an unbiased look.

Thanks

-----Original Message-----

From: Donovan, Betsy
Sent: Wednesday, April 12, 2017 12:13 PM
To: Vaughn, Stephanie <Vaughn.Stephania@epa.gov>
Subject: RE: Rolling Knolls....

I probably need to give you some updates on the site status. We met with PRPs while you were away and they presented a "risk-based" remedy concept for soil (soil alt. 3 in DSRA) that would cap about 45 acres to meet BHHRA trespasser risk for reasonably anticipated future use and would also include a fence to prevent exposures to contamination that would fall between the BHHRA risk and NJDEP ARAR. We've had some risk-based calls with PRPs and NJDEP and the alternative remediation standard is being tossed around again. We will have a meeting with NJDEP, PRPs the week of April 24th to explore this risk-based concept in more detail.

-----Original Message-----

From: Vaughn, Stephanie
Sent: Wednesday, April 12, 2017 11:25 AM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Subject: RE: Rolling Knolls....

Hi Betsy,

I'm reviewing the DSRA and am wondering if the 3 scenarios I described below are still under consideration, or if things changed again.

Sorry, I know I'm behind on this site but the details seem to change on a regular basis!

Thanks,
Stephanie

-----Original Message-----

From: Donovan, Betsy
Sent: Friday, March 24, 2017 3:41 PM
To: Vaughn, Stephanie <Vaughn.Stephania@epa.gov>
Subject: RE: Rolling Knolls....

Yes. That's a decent summary. Doug said they didn't have to go to Dana on this. Juan had some updates on discussions with Charles in OECA, Rich Ricci and Damon Sedita for us - basically more of the same, although my recollection of Juan's discussion with Charles escapes me. I will set up a pre-brief with Angela, Michael and Juan.

When you say full excavation - that alternative would meet residential standards. Would that include off-site disposal or on-site consolidation with capping? or both I suppose, we didn't get into that level of detail.

I think we will require hot spot work for groundwater in any scenario. But we may also need some hot spot capping for surface soil exposure.

Betsy Donovan
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290 Broadway - 19th Floor
New York, NY 10007
212-637-4369

From: Vaughn, Stephanie
Sent: Friday, March 24, 2017 3:00 PM
To: Donovan, Betsy
Subject: Rolling Knolls....

Hi Betsy,

I've been meaning to follow up, but just saw Michael and he filled me in on the Rolling Knolls call with HQs. His summary was that we agreed to evaluate at least the following 3 general scenarios in the FS:

- One full excavation (which may get screened out)
- One mixed use (or more than one)
- One all recreational, probably with some hot spot work.

Is this your takeaway?

Also, you still have a call (or meeting?) with the PRP group next week, right? Please brief Angela on the outcome of this call before that.

Thanks!

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